



NORTH AMERICAN WATER OFFICE

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May 8, 2009

William Cole Storm,
State Planning Director
Department of Commerce
85 7th Place East
Suite 500
St. Paul, MN 55101-2198

RE: Environmental Impact Statement
Xcel Energy Prairie Island Nuclear Generating Plant
Extended Power Uprate Project, PUC Docket No. E002/CN-08-509, E002/GS-08-690
Request for Additional Dry Cask Storage, PUC Docket no. E002/CN-08-510

Dear Mr. Storm:

As a member of the Citizen's Advisory Task Force on Xcel Energy's Prairie Island Nuclear Generating Plant Uprate and Dry Cask Storage proposal I am submitting the following comments on the Draft Environmental Impact Statement (DEIS) on behalf of the North American Water Office.

1. The current liquid and gaseous radionuclides released from the Prairie Island Nuclear Generating Plant (PINGP) characterized as indistinguishable from background radiation (page 81), are not based on monitoring that defines the dispersion plumes of said radioactive releases that are reported as part of the PING permit and license.
2. There is no cumulative total for the number of curies emitted from plant operations and are charted in scientific notation when a special request was made for language that was understandable by the public. (Table 4-7,4-8,4-9).
3. Background radiation levels in Minnesota as defined in the original Environment Statement (p. V29, 1973) for the PINGP were 150 millirem per year. Background radiation today has been defined as 360 millirem each year in the current DEIS (p.75). Every additional radioactive release adds to this level. BEIR VII states there is no safe dose of ionizing radiation and every dose is an opportunity for cancer.



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Board of Directors: Laurence LaFond, chair; Ralph Hilgendorf, vice chair; Diane Rother, secretary/treasurer;
Louis Alemanyeh; Sara Axtell; Bruce Drew; Rosalie Wahl
George Crocker, Executive Director

4. The DEIS does not calculate the health risk exposure from the solid wastes that are collected, processed, packaged and temporarily stored prior to shipping (p. 84).

5. The recent Code Yellow violation (February 10, 2009, NRC Finding) of standards for levels of radiation allowable in transportation of such radioactive solid waste materials from Prairie Island was “more than five times, but less than ten times” the allowable limit of 200 millirems/per hour, and instead was determined to be 1630 millirems/per hour. There is no mention of this violation in the DEIS.

6. The dispossession of radioactive solid materials affords a pathway of exposure and must be considered within the DEIS. Affects of exposure to this radiation cannot be determined to be insignificant just because the waste is shipped elsewhere, and no rationale is provided as to why shipping the waste off-site justifies a finding that health risks due to these wastes will be insignificant.

7. The DEIS does not calculate totals for the number of cancers and deaths from all sources of radioactive exposures and uses every means to minimize and obfuscate from the public those that will be sickened and die from the project. These cancers and deaths are numerous, as the following chart taken from various pages of the DEIS, demonstrates.

Source	new cancer	death
Ch 1		
Tritium in well water p.84	1	1
Gaseous radioactive wastes p.81	1	1
To the Mississippi River p.82	1	1
Solid wastes p.84	?	?
Ch 2		
ISFSI skyshine public p.26	2.8	1
ISFSI skyshine workers p.27	0.9	0.45
Plant operations workers p.27	0.32	0.16
98 casks Local p.35	0.16	0.08
Cask Failure TN-40 p. 32	0.005	0.003

Cask Failure TN-40HT p.32	0.005	0.002
Transport Federal Repository p.35/6	0.005	0.003
Other abnormal releases and incidents	?	?

8. Many of the pathways of exposure are far in excess of the 1 in 100,000 (p.26, p27, p. 35) so called “Acceptable level of risk” as cited Chapter 1 on page 77 of the DEIS.

9. The original 1973 Environment Statement, by comparison, discusses the potential for at least 29 or 30 accidents and reactor component failures (Table VI-2 p VI-4) and assigns a radiation dosage for such events. The current DEIS provides only 13 scenarios, none of which include multiple tube rupture within the steam generators themselves, for example, or any other component failures in this aging nuclear plant.

This omission is particularly egregious as there was an undetected gaseous leak from the waste gas system in 2007 that lasted for six months, as well as an additional abnormal release due to failure in the steam generator relief valve.

A simple review of the Annual Radioactive Effluent Release Reports for the PINGP depicts a mounting assortment of breaking reactor parts and unscheduled multiple radioactive releases. Such a review was not completed by the Responsible Unit of Government.

10. The North American Water Office incorporates the comments filed by The Prairie Island Study Group as a whole.

11. The historic psychological, spiritual, cultural, health and safety abuses heaped upon the Prairie Island Mdewakanton Dakota Community in relationship to nuclear operations is a matter of public record including legislation, litigation, rulemaking, a corporate shareholder resolution, news media which called the project environmental racism in 1994, anthropological and archeological educational research, and is grossly mischaracterized by the DEIS as an economic benefit to a marginalized community (Chapter 1, p. 57).

12. If a catastrophic worst case scenario occurs at Prairie Island and all 450 residents are exposed as theorized (Ch.2 p.33), the DEIS only considers a scenario that may damage a few cask seals and is described as no significant threat to the Dakota Community. The worst-case scenario is described as fractions of a person, not even one additional cancer or death. The DEIS fails to mention, however, a very real threat, which is a terroristic

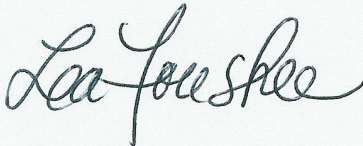
attack for example using anti-tank ground warfare (ATGW) weapons on the spent fuel pool, with its exposed exterior wall outside of containment and not hardened, or a cascading steam tube rupture event. In addition the same ATGW would completely penetrate a dry cask not just cause the seal to be broken. Such an attack could mean evacuation and abandonment of who ever survived such a catastrophe.

13. The DEIS does not consider dispersed renewable alternatives that can combine wind with biofuels or other renewable generation for dispatch purposes, and that could be strategically located in communities and not require additional transmission lines. There are Minnesota Public Utilities Commission studies that document at least 600 MW of dispersed generation, in increments of 10 to 40 MW, are possible without any new transmission. The DEIS completely ignores the least cost least harm to the people of Minnesota and the environment (Chapter 2. p. 54).

Conclusion

The DEIS does not fulfill its intended purpose, which is to inform the public and decision-makers about costs, benefits, and consequences of the proposed activity. Instead it attempts to manufacture consent for the proposed activities by excluding obvious costs, liabilities, and alternative, viable electric utility management options. If public interests are to be served, this DEIS must be rejected in its entirety, and the Agency ordered to start over at the beginning.

Sincerely,

A handwritten signature in cursive script, reading "Lea Foushee". The signature is written in dark ink and is positioned above the printed name.

Lea Foushee